



South Coast Air Quality Management District

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FAXED: MARCH 30, 2007

March 30, 2007

Mr. Ernest Egger
City of Beaumont
Planning Department
550 East 6th Street
Beaumont, CA 92223

Dear Mr. Egger:

**Draft Environmental Impact Report (DEIR) for Oak Valley Commercial Project
Beaumont: February 2007**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.,
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS: CB

RCC070216-03
Control Number

**Draft Environmental Impact Report (DEIR) for
Oak Valley Village Commercial Project: February 2007**

1. Significant Air Quality Impacts:

The lead agency states on page 4.1-12 of the DEIR that “long-term effects on nearby sensitive receptors could not occur as commercial uses are not of a type to generate substantial pollutant concentrations. Impacts are therefore considered less than significant.” The lead agency provides no analysis or evidence to support the statement that the impacts will be less than significant. Performing the analyses recommended in comments #2 and #4 below will assist the lead agency with determining impacts to sensitive receptors.

2. Diesel Truck Emissions and Health Risks:

The lead agency estimates on page 4.1-10 of the DEIR that the proposed project will generate an additional 13,766 vehicle trips per day at buildout. Although the lead agency does not provide a breakdown of the vehicles by vehicle type, the proposed project which includes a “large home improvement warehouse retailer as the major anchor as well as additional nine “major” retail establishments” (see page 2-2 of the DEIR). The large home improvement warehouse retailer in particular, is likely to include a sizeable number of truck trips delivering goods (as many as 526 truck trips per day according to the URBEMIS 2002 output sheet in Appendix B). The lead agency does not quantify potential truck trips nor does it provide any information on the number of trips by heavy-duty diesel trucks that would transport materials and supplies to the proposed home improvement warehouse and the other nine retail outlets.

Given that the California Air Resources Board (CARB) has designated diesel particulate as a carcinogen, the lead agency needs to demonstrate that the diesel emissions from these trucks will not pose a health (cancer) risk to the residential community located 110 feet to the north of the proposed project site. SCAQMD staff therefore recommends that the lead agency perform an air toxics health risk analysis of the diesel truck emissions for the proposed project. The SCAQMD has developed a methodology for estimating cancer risks from mobile sources entitled *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions* which can be accessed at the SCAQMD website: www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html.

3. Localized Impacts:

Consistent with the SCAQMD’s environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors, i.e., the residential communities to the north. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the

health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.

Note that localized Impacts analysis should be done for both construction and operation and there are two corresponding look-up tables for that as well.

4. PM2.5 Emissions:

In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. In conjunction with the PM2.5 calculation methodology, the SCAQMD has also adopted regional and localized significance thresholds for PM2.5. For the proposed project and future projects, it is recommended that the lead agency evaluate the emissions against the recommended regional and localized significance thresholds. Guidance for preparing the PM2.5 significance analysis can be found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html

Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

5. Reducing Operational NO_x Emissions:

Given that the proposed project's long-term emissions are significant, SCAQMD staff recommends that the lead agency consider the following additional mitigation measures wherever feasible:

- Require the use of newer, lower-emitting trucks for the delivery of materials and supplies to the facility.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes in compliance with state law.
- Use light-colored roofing materials to deflect heat and conserve energy.
- Install solar panels on roofs to supply electricity for air conditioning.
- Install central water heating systems to reduce energy consumption.
- Install high energy-efficient appliances, such as water heaters, refrigerators, furnaces and boiler units.
- Use double-paned windows to reduce thermal heat.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Provide electrical hook-ups for trucks that need to cool their load.
- Electrify auxiliary power units.
- Electrify service equipment at facility.

- Require home improvement company management to provide flyers and pamphlets for truck drivers educating them on the health effects of diesel particulate and the importance of being a good neighbor.